

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE DENTSPLY SIRONA, INC.
SECURITIES LITIGATION,

No. 24 Civ. 9083 (NRB)

**STIPULATION AND [PROPOSED] ORDER CONCERNING THE FILING OF THE
CONSOLIDATED COMPLAINT AND THE RESPONSE THERETO**

Lead Plaintiffs HANSAINVEST Hanseatische Investment-Gesellschaft mit beschränkter Haftung (“HANSAINVEST”) and City of Miami General Employees’ & Sanitation Employees’ Retirement Trust (“Miami Retirement Trust” and, together with HANSAINVEST, “Lead Plaintiffs”) and Defendants Dentsply Sirona Inc. (“Dentsply”), Donald M. Casey, Jr., Jorge M. Gomez, Neeraj Gunsagar, Simon D. Campion, Glenn G. Coleman, Andreas G. Frank, and John P. Groetelaars (collectively, “Defendants” and, together with Lead Plaintiffs, the “Parties”), through their undersigned counsel, hereby stipulate and agree as follows:

1. **WHEREAS**, on November 26, 2024, a Dentsply investor filed a securities class action in this District alleging violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934 and U.S. Securities and Exchange Commission Rule 10b-5 promulgated thereunder, against Defendants Dentsply, Simon D. Campion, Glenn Coleman, and Andreas G. Frank, captioned *North Collier Fire Control and Rescue District Firefighters Retirement Plan v. Dentsply Sirona Inc.*, No. 1:24-cv-09083-NRB (“*North Collier*”);
2. **WHEREAS**, on December 18, 2024, a second Dentsply investor filed a substantially similar securities class action in this District against Defendants Dentsply, Donald M. Casey, Jr., John P. Groetelaars, Simon D. Campion, Glenn Coleman, and Andreas G. Frank, captioned *Calvin v. Dentsply Sirona Inc.*, No. 1:24-cv-09764-NRB (“*Calvin*”);
3. **WHEREAS**, on December 19, 2024, a third Dentsply investor filed a substantially similar securities class action in this District against Defendants Dentsply, Donald M. Casey, Jr., Jorge M. Gomez, Neeraj Gunsagar, Simon D. Campion, Glenn G. Coleman, and Andreas G. Frank, captioned *Key West Police & Fire Pension Fund v. Dentsply Sirona Inc.*, No. 1:24-cv-09819-NRB (“*Key West*”);

4. **WHEREAS**, Defendants Dentsply, Donald M. Casey, Jr., Simon D. Campion, and Glenn G. Coleman accepted service of the complaint in *Calvin* on January 3, 2025 (*Calvin*, ECF Nos. 16, 17, 19, 28), Defendant Andreas G. Frank accepted service of the complaint in *Calvin* on January 6, 2025 (*Calvin*, ECF No. 18), and Defendant John P. Groetelaars accepted service of the complaint in *Calvin* on February 10, 2025 (*Calvin*, ECF No. 30);

5. **WHEREAS**, on January 27, 2025, pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), several Dentsply investors filed motions seeking appointment as Lead Plaintiff, approval of selection of Lead Counsel, and consolidation of related actions;

6. **WHEREAS**, on February 21, 2025, pursuant to the PSLRA, the Court entered an order consolidating *North Collier*, *Key West* and *Calvin* (the “Consolidated Actions”) pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, appointing HANSAINVEST and Miami Retirement Trust as Lead Plaintiffs, and appointing Bernstein Litowitz Berger & Grossmann LLP as Lead Counsel (ECF No. 38, the “Leadership Order”);

7. **WHEREAS**, in the Leadership Order, the Court set a schedule by which Lead Plaintiffs were to file an amended complaint by April 7, 2025, Defendants’ response was due May 22, 2025, Lead Plaintiffs opposition to any motion(s) to dismiss was due by July 7, 2025, and Defendants were to file any reply by August 1, 2025;

8. **WHEREAS**, as of the date of the Court’s Leadership Order and up and through March 11, 2025, Defendants Gomez and Gunsagar were in the process of obtaining counsel and had not yet been served or accepted service;

9. **WHEREAS**, Defendant Gomez has now retained counsel and has agreed to accept service, as set forth below, and Defendant Gunsagar has authorized counsel to Dentsply to accept service on his behalf;

10. **WHEREAS**, to ensure the just and efficient prosecution of the action, to accommodate the scheduling impact accompanied by the delay in service of the complaint with respect to Defendants Gomez and Gunsagar, and to ensure uniform briefing schedule for all Parties, the Parties have agreed to a proposed adjustment to the schedule for the filing of the amended complaint and Defendants' response thereto;

11. **WHEREAS**, the Parties' proposed schedule contemplates a schedule similar to the one previously ordered by the Court in this case and similar to amended complaint and motion to dismiss briefing schedules approved by the Court in other PSLRA securities class actions, including, for example, in *In re Hexo Corp. Securities Litigation*, No. 1:19-cv-10965-NRB (S.D.N.Y.); *City of St. Clair Shores Police and Fire Retirement System v. Credit Suisse Group AG*, No. 1:21-cv-03385-NRB (S.D.N.Y.);

IT IS HEREBY STIPULATED AND AGREED, by and between undersigned counsel for Lead Plaintiffs HANSAINVEST and Miami Retirement Trust and Defendants, and subject to Court approval, that the following shall govern the filing of, and responses to, the amended complaint, as well as the briefing on any motion to dismiss:

1. Defendants Gomez and Gunsagar, through their undersigned counsel, accept service of the complaint in *Key West*, and all Defendants shall accept service of the amended complaint to be filed in the Consolidated Action as set forth below;
2. Lead Plaintiffs shall file an amended complaint by May 9, 2025;
3. Defendants shall file any answer or motion(s) to dismiss by July 8, 2025;
4. Lead Plaintiffs shall file an opposition to any motion(s) to dismiss by September 8, 2025;

5. Defendants shall file any reply in support of any motion(s) to dismiss by October 8, 2025.

Dated: March 7, 2025

/s/ Salvatore J. Graziano

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limited purpose of entering into this stipulation*

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*All electronic signatures (“/s/”) are signed with consent of counsel pursuant to Rule 8.5 of this Court’s Electronic Case Filing Rules & Instructions, as of July 24, 2023.

SO ORDERED.

Dated: March 12, 2025

New York, New York



The Honorable Naomi Reice Buchwald
United States District Judge